

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FRONTIER COMMUNICATIONS OF
NEW YORK, INC.

Plaintiff,

- against -

INTERNATIONAL BROTHERHOOD OF ELECTRICAL :
WORKERS, AFL-CIO, LOCAL UNION 503, :

Defendant.

:
:
:
: **NOTICE OF DEFENDANT'S**
: **MOTION TO DISMISS**
: **PLAINTIFF'S**
: **COMPLAINT PURSUANT**
: **TO FED. R. CIV. P. 12(b)(6)**

: 07-CV-10327
: (Lynch, J.)
: (Eaton, M.J.)
:
: X

PLEASE TAKE NOTICE that upon the attached declaration of Vincent F. O'Hara, Esq., the exhibits annexed thereto, the Defendant's supporting memorandum of law and Plaintiffs' November 14, 2007 Complaint, and pursuant to Federal Rule of Civil Procedure 12(b)(6) and Local Rules 6.1 and 7.1 of the Southern District of New York, Defendant International Brotherhood of Electrical Workers, AFL-CIO, Local Union 503 ("IBEW 503"), by their attorneys, hereby request that all opposing affidavits and answering memoranda be served upon the undersigned movant within ten (10) business days after service of the moving papers in accordance with Local Rule 6.1(b).

Dated: New York, New York
January 18, 2008

Respectfully submitted,

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